

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

_____)	
AMPEX CORPORATION,)	
)	
<i>Plaintiff,</i>)	C.A. No. 04-1373 (KAJ)
)	
v.)	
)	
EASTMAN KODAK COMPANY,)	
ALTEK CORPORATION, and)	
CHINON INDUSTRIES, INC.,)	
)	
<i>Defendants.</i>)	
_____)	

**NOTICE OF DEPOSITION OF
DEFENDANT EASTMAN KODAK COMPANY**

TO: All Parties and their Attorneys of Record:

PLEASE TAKE NOTICE: Pursuant to Federal Rule of Civil Procedure 30(b)(6), Ampex will take the deposition of Defendant Eastman Kodak Company (“Kodak”), commencing on December 19, 2005, at 9:00 a.m., at the law offices of Ropes & Gray, 1251 Avenue of the Americas, New York, NY 10020, or at such other time and place agreed upon by the counsel to the parties.

Kodak shall designate one or more of its officers, directors or managing agents, or other persons with knowledge of the matters set forth in Schedule A of this notice to appear and testify on its behalf at the deposition. The persons so designated shall testify as to matters known or reasonably available to Kodak.

This examination will be taken before a Notary Public or other person authorized to administer oaths and will be recorded stenographically and/or by video and shall continue from day to day until completed.

You are invited to attend and cross-examine.

MORRIS, NICHOLS, ARSHT & TUNNELL

/s/ Julia Heaney (#3052)

Jack B. Blumenfeld (#1014)

Julie Heaney (#3052)

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November 30, 2005

SCHEDULE A

INSTRUCTIONS AND DEFINITIONS

Ampex incorporates by reference the instructions and definitions set forth in its First Set of Document Requests to Defendant Eastman Kodak Company (1-70) and its Fourth Set of Document Requests to Defendant Eastman Kodak Company (92-136).

SUBJECT MATTER CATEGORIES

1. Kodak's efforts to provide discovery in response to Ampex's First, Second, Third, and Fourth Sets of Document Requests to Eastman Kodak Company ("Ampex's Requests") and Ampex's First Set of Interrogatories to Eastman Kodak Company ("Ampex's Interrogatories"), including without limitation, measures taken to respond to Ampex's Requests and Interrogatories; identification of persons consulted, their title and/or position, organizational unit, division and/or department and location; and identification of documents collected from persons consulted or identified in response to Ampex's Requests and Interrogatories.

2. The role of persons identified in Kodak's responses and supplemental responses, if any, to Ampex's Interrogatory No. 2, including without limitation, their title and/or position, organizational unit, division and/or department, location and specific responsibilities with respect to the Kodak Devices.

3. Kodak's worldwide organizational structure as it relates to sales, marketing, profits, costs, and the market for the Kodak Devices, including without limitation, identification of each of Kodak's organizational units, divisions and/or departments involved, the relationship of each such unit to each other, and identification of the individuals who have held executive or operational management positions for each such unit.

4. Kodak's worldwide organizational structure as it relates to sales, marketing, profits, costs, and the market for the Accessories, including without limitation, identification of each of Kodak's organizational units, divisions and/or departments involved, the relationship of each such unit to each other, and identification of the individuals who have held executive or operational management positions for each such unit.

5. Kodak's worldwide organizational structure as it relates to sales, marketing, profits, costs, and the market for services related to digital cameras (including without limitation services relating to the printing or processing of digital photographs), including without limitation, identification of each of Kodak's organizational units, divisions and/or departments involved, the relationship of each such unit to each other, and identification of the individuals who have held executive or operational management positions for each such unit.

6. Identification of the documents, or types of documents, and location of documents relating to the sales, marketing, profits, costs, and the market for the Kodak Devices.

7. Identification of the documents, or types of documents, and location of documents relating to the sales, marketing, profits, costs, and the market for the Accessories.

8. Identification of the documents, or types of documents, and location of documents relating to the sales, marketing, profits, costs, and the market for services related to digital cameras (including without limitation services relating to the printing or processing of digital photographs).

9. Kodak's document control procedures as those procedures relate to the collection, revision, location, possession, custody and control of the documents referenced in categories 6-8.

10. Kodak's document control procedures as those procedures relate to how and where the documents referenced in categories 6-8 are stored and maintained on computer systems, procedures for generating and storing back-up copies of documents stored and maintained on computer systems, and the location, possession, custody and control of those documents and their back-up copies.

CERTIFICATE OF SERVICE

I, Julia Heaney, hereby certify that on November 30, 2005, I caused to be electronically filed the foregoing Notice of Deposition of Defendant Eastman Kodak Company with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Paul M. Lukoff, Esquire
David E. Brand, Esquire
Prickett, Jones & Elliott, P.A.

and that I caused copies to be served upon the following in the manner indicated:

BY HAND

Paul M. Lukoff, Esquire
Prickett, Jones, Elliott,
1310 King Street
Wilmington, DE 19899

BY FEDERAL EXPRESS

Michael J. Summersgill, Esquire
Wilmer Cutler Pickering Hale and Dorr LLP
60 State Street
Boston, MA 02109

/s/ Julia Heaney
Julia Heaney (#3052)